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Order Filed on February 4, 2020
by Clerk
U.S. Bankruptcy Court
District of New Jersey

ATTORNEY FOR CREDITOR: REGIONAL ACCEPTANCE CORPORATION

**IN THE BANKRUPTCY COURT FOR THE
DISTRICT OF NEW JERSEY (CAMDEN)
HONORABLE JERROLD N. POSLUSNY, JR.**

In re: : Case No. 19-13736-JNP
:
JOHN WORTHY, AND :
GEORGINA WORTHY, :
Debtors, :
: Chapter 13
:
: Hearing Date: February 4, 2020
:
_____ :

**CONSENT ORDER MODIFYING STAY AS TO MOTOR VEHICLE
2014 DODGE GRAND CARAVAN EXTENDED PASSENGER VAN SXT 3.6L V6, VIN
#2C4RDGCG8ER154854**

The relief set forth on the following pages, number one (1) through four (6) is hereby
ORDERED.

DATED: February 4, 2020



Honorable Jerrold N. Poslusny, Jr.
United States Bankruptcy Court

Debtors: John Worthy and Georgina Worthy
Case No.: 19-13736-JNP
Caption of Order: Consent Order Modifying Stay as to Personal Property

1. The 11 U.S.C. §362(a) Stay as to Regional Acceptance Corporation, ("Movant"), with respect to the personal property of Debtors described as a 2014 Dodge Grand Caravan Extended Passenger Van SXT 3.6L V6, VIN #2C4RDGCG8ER154854, in accordance with the agreement of the Debtors and Movant is hereby modified and shall remain in effect

PROVIDED THAT Debtors comply with the following terms and conditions:

The arrears are \$3,800.76 as of the date of this Consent Order. Debtors shall cure the arrears and fees and costs by making a payment in the amount of \$400.00 at the entry of the Consent Order and then by making the following payments on the following dates:

February 28, 2020 - \$1,164.85

March 28, 2020 - \$1,164.85

April 28, 2020 - \$1,164.85

May 28, 2020 - \$1,164.85

June 28, 2020 - \$1,164.85

July 28, 2020 - \$1,164.85

Debtor shall then be responsible for timely making all future regular monthly payments to Movant starting with the payment of \$598.07 due on August 10th, 2020. Failure to make future monthly payments shall also be cause for default under this Consent Order.

2. The term "payment" as set forth in Paragraph 1, *supra*, does not include a check that is returned due to insufficient funds, account closed or is otherwise not capable of negotiation for any other reason.

Debtors: John Worthy and Georgina Worthy
Case No.: 19-13736-JNP
Caption of Order: Consent Order Modifying Stay as to Personal Property

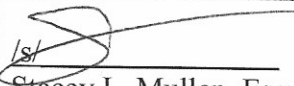
3. Debtor will be in default under the Consent Order in the event that Debtor fails to comply with the payment terms and conditions in Paragraph 1, *supra*. If Debtor fails to cure the default within ten (10) days from the date of default, Movant may file a Certification of Default on five (5) days' notice to Debtor, counsel for the Debtor and the Chapter 13 Trustee for an Order lifting the automatic Stay imposed under 11 U.S.C. §362(a) and permitting Movant to exercise any rights under the loan documents with respect to the motor vehicle including, but not limited to, initiating and completing sale of the motor vehicle without regard to any future conversion of this matter to a different form of bankruptcy.

4. The failure of Movant to file a notice of default will not be construed or act as a waiver of any of the rights of Movant under the Consent Order.

5. In the event the Debtor converts to a bankruptcy under any Chapter other than Chapter 13 of the Bankruptcy Code, then Debtor shall pay all pre-petition arrears and post-petition arrears within fifteen (15) days from the date the case is converted from Chapter 13 to any other Chapter.

6. Movant's fees and costs of \$631 are to be paid through the Chapter 13 Plan.

We hereby Consent to the form and entry of the foregoing Order.

<p>/s/ Keri P. Ebeck Keri P. Ebeck, Esquire Bernstein-Burkley, P.C. 707 Grant Street, Suite 2200 Gulf Tower Pittsburgh, PA 15219 (412) 456-8112 Email: kebeck@bernsteinlaw.com</p>	<p>/s/  Stacey L. Mullen, Esquire Law Office of Stacey L. Mullen 2091 N. Springfield Rd Suite 17 Cherry Hill, NJ 08003 (856) 778-8677 Email: slmullen@comcast.net</p>
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Dated: February 10, 2020